



THE MIRVIS LAW FIRM, P.C.

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July 19, 2021

VIA ELECTRONIC FILING
Honorable Alison J. Nathan
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

**Re: US v. Mosha, et al
21-CR-92 (AJN)**

Dear Judge Nathan:

On behalf of Mr. Danskoi, I respectfully submit this Application to modify Mr. Danskoi's conditions of pretrial release.

Mr. Danskoi was arrested on February 18, 2021, and was released on February 22, 2021, pursuant to an agreed upon bail package which required a \$300,000 bond signed by four suretors, home incarceration with GPS monitoring and pretrial supervision as directed by pretrial services with travel restricted to SDNY and EDNY. Mr. Danskoi has been fully compliant with all of his pretrial release conditions.

SO ORDERED.

Mr. Danskoi respectfully requests that his pretrial release conditions be modified from home incarceration to a 9 pm curfew with GPS monitoring. This request is necessary because Mr. Danskoi is suffering from several debilitating physical ailments that have gotten steadily worse. He is currently unable to exercise while he has been on home confinement.

Attached, please find 2 letters from Dr. Khanukayev and Dr. Khan. Dr. Khanukayev wrote that Mr. Danskoi suffers from inflammatory arthropathy. While Dr. Khan writes that Mr. Danskoi needs to do physical massages to his troubled areas, swimming, exercise therapy and last but not least long walks outside are required in order to prevent further disability.

A handwritten signature in black ink, appearing to read 'Alison J. Nathan', is enclosed in a rectangular border.

7/19/2021
SO ORDERED.
ALISON J. NATHAN, U.S.D.J.



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Dr. Muradov wrote that she is treating Mr. Danskoi for a foot problem and that he suffers from osteoarthritis, bursitis, and HAV. Dr. Muradov further writes that Mr. Danskoi would benefit from Range of Motion exercises, hydrotherapy and swimming.

Mr. Danskoi's current release conditions make it impossible for him to obtain the prescribed/recommended treatments for his various medical conditions. It is my understanding that the conditions are getting worse and if Mr. Danskoi continues without engaging in the various prescribed/recommended treatments, he will get much worse.

Pretrial services does not object to this Application. AUSA Felton, likewise does not object to this Application,

Mr. Danskoi and I thank the Court for its consideration of this Application.

Sincerely,

By: /s/ Tony Mirvis
Tony Mirvis, Esq.
Attorney for Uladzimir Danskoi